

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	
KEYONTA TYREESE MCDOUGALD	:	1:22CR <u>401</u> -1
LARRY BERNARD BROWN	:	1:22CR <u>401</u> -2
BRIAN THOMAS BRIGHT	:	1:22CR <u>401</u> -3
ROBERT TERRELL BUSH	:	1:22CR <u>401</u> -4
ROSA RAQUEL DIAZ	:	1:22CR <u>401</u> -5
HUGO ENRIQUE OLVERA SANCHEZ	:	1:22CR <u>401</u> -6
WILLIAM SAMUEL PERGERSON	:	1:22CR <u>401</u> -7
TYQUAN BERNARD JONES	:	1:22CR <u>401</u> -8



The Grand Jury charges:

From on or about September 15, 2021, continuing up to and including on or about January 20, 2022, the exact dates to the Grand Jurors unknown, in the County of Lee, in the Middle District of North Carolina, and elsewhere, KEYONTA TYREESE MCDOUGALD, LARRY BERNARD BROWN, BRIAN THOMAS BRIGHT, ROBERT TERRELL BUSH, ROSA RAQUEL DIAZ, HUGO ENRIQUE OLVERA SANCHEZ, WILLIAM SAMUEL PERGERSON, TYQUAN BERNARD JONES, and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate, and agree together and with each other to commit offenses against the laws of the United States, that is:

1. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);

2. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);

3. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1); and

4. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1).

Quantities of Controlled Substances Involved in the Conspiracy

With respect to KEYONTA TYREESE MCDUGALD, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl.

With respect to LARRY BERNARD BROWN, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl.

With respect to BRIAN THOMAS BRIGHT, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl.

With respect to ROBERT TERRELL BUSH, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 40 grams or more of a

mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl.

With respect to ROSA RAQUEL DIAZ, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to HUGO ENRIQUE OLVERA SANCHEZ, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B) and 841(b)(1)(C).

DATED: December 19, 2022

SANDRA J. HAIRSTON
United States Attorney



BY: JACOB D. PRYOR
Assistant United States Attorney

(A TRUE BILL: )

FOREPERSON 